

Exhibit 23

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

CIVIL ACTION NOS.:

1:16-cv-46-S

1:16-cv-447-S

SHEET METAL WORKERS LOCAL)
NO. 20, et al.,)

Plaintiffs,)

-vs-)

CVS PHARMACY, INC., et al.,)

Defendants.)

VIDEO DEPOSITION OF R. IRENE NEWMAN

The video deposition upon oral examination of R. IRENE NEWMAN, a witness produced and sworn before me, Diane Zeyen, RPR, a Notary Public in and for the County of Hamilton, State of Indiana, taken on behalf of the Defendants CVS Pharmacy, Inc., and Caremark, LLC, at the offices of Taft Stettinius & Hollister, LLP, One Indiana Square, Suite 3500, Marion County, Indiana, on the 17th day of December, 2018, at 9:00 a.m., pursuant to the Federal Rules of Civil Procedure with written notice as to time and place thereof.


<p>1 APPEARANCES</p> <p>2</p> <p>3 FOR THE PLAINTIFFS SHEET METAL WORKERS LOCAL</p> <p>4 NO. 20, et al., and IRENE NEWMAN:</p> <p>5 Zoran (Zoki) Tasic</p> <p>6 HAGENS BERMAN SOBOL SHAPIRO LLP</p> <p>7 455 North Cityfront Plaza Drive</p> <p>8 Suite 2410</p> <p>9 Chicago, IL 60611</p> <p>10 708.628.4949</p> <p>11 zorant@hbsslaw.com</p> <p>12</p> <p>13 and</p> <p>14</p> <p>15 William N. Riley</p> <p>16 RILEY WILLIAMS & PIATT, LLC</p> <p>17 The Hammond Block Building</p> <p>18 301 Massachusetts Avenue</p> <p>19 Indianapolis, IN 46204</p> <p>20 317.633.5270</p> <p>21 wriley@rwp-law.com</p> <p>22</p> <p>23 FOR THE DEFENDANTS CVS PHARMACY, INC., and CAREMARK,</p> <p>24 LLC:</p> <p>25 Kylie Hoover</p> <p>William T. Burke</p> <p>WILLIAMS & CONNOLLY LLP</p> <p>725 Twelfth Street, N.W.</p> <p>Washington, D.C. 20005</p> <p>202.434.5388</p> <p>khoover@wc.com</p> <p>wburke@wc.com</p> <p>LEGAL VIDEOGRAPHER:</p> <p>Peter Hudson</p>	<p>1 INDEX OF EXHIBITS</p> <p>2 PAGE</p> <p>3 Newman Deposition Exhibit No.:</p> <p>4 Exhibit 1 - Subpoena to Testify at a 15</p> <p>Deposition in a Civil Action</p> <p>5 Exhibit 2 - Administrative Services 24</p> <p>Contract</p> <p>6 Exhibit 3 - CVS Pharmacy Material 39</p> <p>Exhibit 4 - Email Chain Beginning with a 41</p> <p>7 Exhibit 5 - Indiana/Kentucky Carpenters 47</p> <p>Welfare Fund, Minutes of the Meeting</p> <p>8 of the Board of Trustees, Wednesday,</p> <p>March 17, 2010</p> <p>9 Exhibit 6 - Trust Participation Agreement 63</p> <p>Exhibit 7 - UBC Master Template 66</p> <p>10 Exhibit 8 - February 2008 Letter to 68</p> <p>Irene Newman from Bart Gerber with</p> <p>11 Enclosures</p> <p>Exhibit 9 - Twenty-two Page Document 70</p> <p>12 Beginning with a 10/26/11 Email to</p> <p>David Tharp, Michael Lauer,</p> <p>13 Irene Newman from Lynn Smith</p> <p>Exhibit 10 - Amended and Restated 76</p> <p>14 Integrated Prescription Drug Program</p> <p>Master Agreement</p> <p>15 Exhibit 11 - Email Chain Beginning with a 78</p> <p>4/9/16 Email from Patrick Fiduccia</p> <p>16 Exhibit 12 - 3/31/17 Email from 81</p> <p>Patrick Fiduccia with Attachment</p> <p>17 Exhibit 13 - Document Entitled CVS 83</p> <p>Caremark's Generic Rip Off</p> <p>18 Exhibit 14 - Indiana Carpenters Welfare 86</p> <p>Fund's Responses to CVS Pharmacy,</p> <p>19 Inc.'s Fourth Set of Interrogatories</p> <p>to Plaintiffs</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>1 INDEX OF EXAMINATION</p> <p>2 PAGE</p> <p>3 DIRECT EXAMINATION6</p> <p>4 Questions by Kiley Hoover</p> <p>5 CROSS-EXAMINATION91</p> <p>6 Questions by Zoran (Zoki) Tasic</p> <p>7 REDIRECT EXAMINATION97</p> <p>8 Questions by Kiley Hoover</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 THE VIDEOGRAPHER: We are on the record at</p> <p>2 9:00 a.m. on December 17, 2018, beginning the</p> <p>3 video deposition of Irene Newman, taken in the</p> <p>4 matter of Sheet Metal Workers Local 20, et al.,</p> <p>5 versus CVS Pharmacy Inc., pending in the</p> <p>6 United States District Court, for the District</p> <p>7 of Rhode Island, Civil Action No. 116-cv-046.</p> <p>8 This deposition is being held at the</p> <p>9 law office of Taft Stettinius & Hollister,</p> <p>10 One Indiana Square, Suite 3500, Indianapolis,</p> <p>11 Indiana.</p> <p>12 My name is Peter Hudson, the videographer,</p> <p>13 and the court reporter is Diane Zeyen, both</p> <p>14 representing Veritext-Texas.</p> <p>15 Counsel, please now state your appearances.</p> <p>16 MS. HOOVER: Kiley Hoover on behalf of</p> <p>17 CVS Pharmacy, Inc., and Caremark, LLC.</p> <p>18 MR. BURKE: William Burke on behalf of</p> <p>19 CVS Pharmacy, Inc., and Caremark, LLC.</p> <p>20 MR. TASIC: Zoki Tasic on behalf of</p> <p>21 Ms. Newman and also the plaintiffs.</p> <p>22 MR. RILEY: William Riley, Riley Williams &</p> <p>23 Piatt, on behalf of Ms. Newman and the</p> <p>24 plaintiffs.</p> <p>25 THE VIDEOGRAPHER: Thank you. The court</p>

<p>1 Q Is that a local pharmacy?</p> <p>2 A Yes.</p> <p>3 Q And what do you remember about the specifics of</p> <p>4 that program?</p> <p>5 A That I got some drugs for free.</p> <p>6 Q Do you remember what types of drugs were free?</p> <p>7 A Antibiotics, that's the main one that I know.</p> <p>8 Q Okay. And did you have to pay a fee or sign up</p> <p>9 for a program in order to get those free drugs?</p> <p>10 A No.</p> <p>11 Q And do you recall Kmart announcing any type of</p> <p>12 generic program?</p> <p>13 A No.</p> <p>14 Q What about Walgreens?</p> <p>15 A No.</p> <p>16 Q Have you heard of CVS's Health Savings Pass</p> <p>17 program?</p> <p>18 A No.</p> <p>19 Q We are going to talk about that program a little</p> <p>20 bit today. If I refer to it as the HSP</p> <p>21 program --</p> <p>22 A Yeah.</p> <p>23 Q -- is that okay?</p> <p>24 A Yes.</p> <p>25 Q All right. I am going to show you what I will</p> <p style="text-align: right;">Page 38</p>	<p>1 MR. TASIC: Yeah, separate documents, but</p> <p>2 the same look to it. Thank you.</p> <p>3 Q Do any of these documents help refresh your</p> <p>4 recollection about CVS's HSP program?</p> <p>5 A No.</p> <p>6 Q Have you ever seen any marketing material like</p> <p>7 this before?</p> <p>8 A No.</p> <p>9 Q Looking at the first page here, which is</p> <p>10 Bates labeled CVSC-174. Do you see where it</p> <p>11 says "sign up and save"?</p> <p>12 A Yes.</p> <p>13 Q Does that suggest to you that CVS was offering a</p> <p>14 program that required you to sign up?</p> <p>15 MR. TASIC: Objection to form.</p> <p>16 A Yes.</p> <p>17 Q From this document can you tell what pricing</p> <p>18 was being offered through that program?</p> <p>19 MR. TASIC: Objection to form.</p> <p>20 A No.</p> <p>21 Q Do you see where it says "9.99 for 90 days"?</p> <p>22 A Yes.</p> <p>23 Q Okay. And you see above that where it says</p> <p>24 "introducing the new CVS Health Savings Pass"?</p> <p>25 A Yes.</p> <p style="text-align: right;">Page 40</p>
<p>1 mark as Exhibit 3.</p> <p>2 (Newman Deposition Exhibit 3 was marked for</p> <p>3 identification.)</p> <p>4 Q Let's take a look at that for a minute.</p> <p>5 MR. TASIC: I am sorry, I have a question</p> <p>6 about this exhibit.</p> <p>7 MS. HOOVER: Uh-huh.</p> <p>8 MR. TASIC: So we have got Bates numbering,</p> <p>9 so it's just two different documents attached,</p> <p>10 the 174, and then it goes to 190 and 191 and</p> <p>11 194 -- I mean, 192.</p> <p>12 MS. HOOVER: I am sorry, it has two sets of</p> <p>13 Bates stamping on it --</p> <p>14 MR. TASIC: Right. Right.</p> <p>15 MS. HOOVER: -- from two prior litigations,</p> <p>16 so.</p> <p>17 MR. TASIC: Right. Oh, no, I am sorry, I'm</p> <p>18 just looking at the one at the very bottom.</p> <p>19 MS. HOOVER: Oh, yes.</p> <p>20 MR. TASIC: How it doesn't -- it is not all</p> <p>21 in sequence; right?</p> <p>22 MS. HOOVER: Yes.</p> <p>23 MR. TASIC: So 174 goes to 190. I'm</p> <p>24 assuming they were --</p> <p>25 MS. HOOVER: Yeah, separate documents.</p> <p style="text-align: right;">Page 39</p>	<p>1 Q I read that correctly? Did I read that</p> <p>2 correctly?</p> <p>3 A Yes.</p> <p>4 Q Okay. Do you recall ever answering any</p> <p>5 questions from members or trustees about</p> <p>6 pharmacy prescription programs?</p> <p>7 MR. TASIC: Objection to form.</p> <p>8 A No.</p> <p>9 Q Do you recall, we talked about the pharmacy</p> <p>10 Meijer before and their program, do you recall</p> <p>11 any discussions with anyone at the fund about</p> <p>12 the Meijer program?</p> <p>13 A No.</p> <p>14 (Newman Deposition Exhibit 4 was marked for</p> <p>15 identification.)</p> <p>16 Q I am going to show you a document marked</p> <p>17 Exhibit 4. This is an email chain dated</p> <p>18 April 23rd, 2010. Just take a minute to look</p> <p>19 this document over. Do you recognize this</p> <p>20 document?</p> <p>21 A No.</p> <p>22 Q Is this a fair and accurate copy of an email you</p> <p>23 received?</p> <p>24 A That's my name, yes.</p> <p>25 Q Where do you see your name on the document?</p> <p style="text-align: right;">Page 41</p>

<p>1 A At the very top, "From: Irene Newman." 2 Q And the email address on the document is -- 3 A Yes. 4 Q -- INewman@zenithadmin.com? 5 A Yes. 6 Q That was your email address when you were at 7 Zenith Administrators? 8 A At one time, yes. 9 Q Do you recall receiving this email chain in 10 2010? 11 A No. 12 Q Despite the fact that you don't recall it, do 13 you have any reason to believe that you didn't 14 receive this email? 15 A No. 16 Q Is this the document that counsel showed you 17 during your preparation session -- 18 A No. 19 Q -- last week? Okay. 20 So I want you to take a look first at the 21 first email in this email chain, which starts 22 about halfway down on the first page, it is 23 dated April 2nd, 2010. Do you see what I am 24 looking at? 25 A Yes.</p> <p style="text-align: right;">Page 42</p>	<p>1 A I can't recall. 2 Q Do you recall what types of problems you might 3 reach out to Bart Gerber for? 4 A If a member had a problem. 5 Q You don't remember the types of issues -- 6 A No. 7 Q -- he would deal with? 8 A No, I'm sorry. 9 Q That's fine. This email copies two people, 10 Charles Whitson, W-H-I-T-S-O-N, and Louis Zollo, 11 Z-O-L-L-O. 12 Do you know who Mr. Whitson is? 13 A Worked for Medco. 14 Q Okay. Do you know what his position was? 15 A I don't know the title now. 16 Q Is he someone who you might speak with or reach 17 out to on -- 18 A Yes. 19 Q -- member issues? 20 A Yes. 21 Q Similar to Mr. Gerber? 22 A Yes. 23 Q And what about Mr. Zollo? 24 A He also was at Medco, and I believe he was in 25 the pharmacy department.</p> <p style="text-align: right;">Page 44</p>
<p>1 Q Okay. And is this an email from Bart Gerber to 2 you? 3 A Yes. 4 Q Who's Bart Gerber? 5 A He was the manager that we went to with Medco. 6 Q He was employed by Medco? 7 A Yes. 8 Q And he was a contact for prescription drug 9 issues? 10 A Yes. 11 Q Do you remember ever speaking with Bart Gerber 12 in person? 13 A Yes. 14 Q When would you have spoken to him in person? 15 A At the Board of Trustees meeting. 16 Q He also attended those meetings? 17 A Some. 18 Q Did you ever speak to him on the phone? 19 A Yes. 20 Q And how often would you speak to him on the 21 phone? 22 A Maybe once a month. 23 Q Why would you call him? 24 A If a member had a problem with the prescription. 25 Q What types of problems might members have?</p> <p style="text-align: right;">Page 43</p>	<p>1 Q Was he also a person that you would reach out to 2 if members had issues? 3 A No. 4 Q Was there any other reason why you might 5 interact with Mr. Zollo? 6 A No. 7 Q Just look at the first paragraph of this email. 8 What's your understanding of why Mr. Gerber sent 9 this to you? 10 MR. TASIC: Objection to form. 11 A They are talking about a meeting that they 12 brought these issues up. And this is probably a 13 follow-up from that meeting. 14 Q Would Mr. Gerber typically send information 15 directly to you? 16 A I guess on occasion. 17 Q Was it typical for him to send information just 18 to you and not to include other trustees or 19 other people at the fund? 20 A I don't know. 21 Q Okay. I am going to read the first sentence of 22 this April 2nd, 2010 email and if you could just 23 let me know if I've read it accurately. "At the 24 3/17 Board meeting, Mike Lauer mentioned that it 25 would be helpful to have some talking points in</p> <p style="text-align: right;">Page 45</p>

<p>1 MR. TASIC: Objection to form. Asked and 2 answered. 3 A I don't know. 4 Q I'll represent to you that CVS's HSP program was 5 a membership program like Walgreens. 6 Is it then fair to say that CVS was not 7 required to submit its membership program prices 8 as its U&C prices? 9 MR. TASIC: Objection to form. 10 A I don't know. 11 Q What do you understand this language to mean? 12 MR. TASIC: Objection to form. What 13 language are you referring to? 14 MS. HOOVER: Looking again at the language 15 that says "a member-only price differs from the 16 pharmacy's U&C price." 17 A No. I mean, I'm just not aware of this of how 18 this worked. 19 Q Looking at the fourth paragraph on this page, I 20 am just going to read the first sentence this 21 time, "In instances where a Medco card holder 22 pays to enroll in one of the retailers' low cost 23 generic programs, it is the decision of the 24 member as to which card and/or benefit they 25 would like to utilize for the filling of their</p> <p style="text-align: right;">Page 54</p>	<p>1 MR. TASIC: Objection to form. 2 A I read that in the paragraph, yes. 3 Q In other words, they had to choose one or the 4 other? 5 MR. TASIC: Objection to form. 6 A Yes. 7 Q And if they chose the membership program price, 8 then that claim would be adjudicated outside of 9 the benefit under the fund? 10 MR. TASIC: Objection to fund. 11 A I don't know that. 12 MR. TASIC: I just want to ask, how much 13 longer are we going to spend on this document? 14 We are up to an hour or so. I think it would be 15 a good time to take a break soon. 16 MS. HOOVER: I would say less than ten 17 minutes. 18 MR. TASIC: Okay. 19 MS. HOOVER: We will finish up with this 20 one and then move on. 21 THE WITNESS: Okay. 22 MR. TASIC: Does that sound okay? 23 THE WITNESS: Yes. 24 MR. TASIC: Good. 25 Q So looking at the top email, the second email on</p> <p style="text-align: right;">Page 56</p>
<p>1 prescription, as only one benefit card can be 2 used at the point of sale." 3 Did I read that sentence correctly? 4 A Yes. 5 Q Is it possible that some of the fund's members 6 or the beneficiaries chose to enroll in programs 7 like Walgreens' program? 8 MR. TASIC: Objection to form. 9 A I don't know. 10 Q The first part of this sentence says "where a 11 Medco card holder pays to enroll in one of the 12 retailers' low cost generic programs," what do 13 you understand a Medco card holder to mean? 14 A Well, in this case, it would be a participant 15 under the Indiana Carpenters Welfare Fund. 16 Q So does this sentence, do you understand this 17 sentence to suggest that those -- the fund's 18 members could enroll in these programs? 19 A Yes. 20 MR. TASIC: Objection to form. 21 Q Still focused on that sentence, do you 22 understand that if those members enrolled in the 23 program they couldn't combine the benefit they 24 had through the fund with the benefit under the 25 program?</p> <p style="text-align: right;">Page 55</p>	<p>1 this chain, back on the first page, do you see 2 that you forwarded this email to four recipients 3 on April 23rd, 2010? 4 A Yes. 5 Q And who were those recipients, starting with the 6 email address mjlmbl@a- -- 7 A Mike Lauer. 8 Q That's Mike Lauer. Is that a personal address? 9 A Yes. 10 Q Do you know if he also used a business address 11 for fund issues? 12 A Yes. 13 Q And who is Mike Lauer? 14 A A trustee. 15 Q And the second benefi- -- or, sorry, the second 16 recipient that you forwarded the email to is 17 David Tharp? 18 A Yes. 19 Q Who is David Tharp? 20 A He's the EST. 21 Q He's the what? 22 A The EST. 23 Q What is that? 24 A Actually on this it would be he was the 25 co-chairman of the Board of Trustees for the</p> <p style="text-align: right;">Page 57</p>

<p>1 Indiana Carpenters Welfare Fund. 2 Q And what did you say he was? What was the first 3 thing you said? 4 A Executive secretary/treasurer for the 5 Indiana Carpenters. 6 Q The union? 7 A The union, yes. 8 Q Okay. So he had, at the time of this email he 9 had a position within the union -- 10 A Yes. 11 Q -- separately at a position within the fund? 12 A Yes. 13 Q And he was receiving this email in his capacity 14 as a trustee for the fund? 15 A Yes. 16 Q And Wnix@industrialcontractors.com? 17 A William Nix, he was a co-chairman. 18 Q Co-chairman for what? 19 A Indiana Carpenters Welfare Fund. 20 Q In other words, David Tharp and William Nix were 21 the co-chairmen of the fund's Board of Trustees? 22 A Yes. 23 Q And you cc'd MaryJayne Mahern? 24 A Yes. 25 Q Who is that?</p> <p style="text-align: right;">Page 58</p>	<p>1 Q So you were just forwarding to a subset of those 2 trustees? 3 A Well, and, actually, if you look at the list of 4 trustees, there are six on each side. 5 Q Okay. So 12 at the time? 6 A Yes. 7 Q And you were just sending to the co-chairmen and 8 to the trustee who asked the question? 9 A That's correct. 10 Q Do you recall discussing this information with 11 any of these -- 12 A No. 13 Q -- recipients? 14 Putting aside this specific email, do you 15 recall any discussions with any trustee about 16 generic drug programs? 17 A No. 18 Q Do you recall ever responding to Mr. Gerber's 19 email? 20 A No. 21 Q Do you recall ever discussing this information 22 with Mr. Gerber? 23 A No. 24 Q Do you ever recall discussing this information 25 with anyone?</p> <p style="text-align: right;">Page 60</p>
<p>1 A That's Dave Tharp's secretary. 2 Q Do you recall why you forwarded this email to 3 these recipients? 4 A Because they're the main trustees. 5 Q What do you mean when you say "main trustees"? 6 A Well, two are the co-chairmen. And then 7 Mike Lauer, he had some knowledge about the 8 prescription plan, and he had asked the question 9 below also. 10 Q When you say Mike Lauer had some knowledge about 11 prescription drug -- or the prescription drug 12 plan, what do you mean? 13 A He asked the question below. 14 Q Do you recall him other times raising other 15 issues about the prescription drug benefit? 16 A At times, yes. 17 Q Does he stick out in your mind as asking more 18 questions about that benefit than other 19 trustees? 20 A No. 21 Q How many trustees were there at the time? 22 A I believe five union, five management. 23 Q Okay. 24 A But I would probably have to go back to my 25 records and check that.</p> <p style="text-align: right;">Page 59</p>	<p>1 A No. 2 Q After receiving this email from Mr. Gerber, do 3 you know if the fund requested that Medco make 4 any modifications to its prescription drug 5 benefit? 6 A No. 7 MR. TASIC: Objection to form. 8 Q No, you don't know or, no, they didn't? 9 A No, I don't know. 10 Q Do you know if the fund made any request to 11 change the pricing that Medco offered? 12 MR. TASIC: Objection to form. 13 A I don't know. 14 Q Do you know if the fund or anyone else told 15 Medco that it expected to receive the prices 16 offered -- 17 MR. TASIC: Objection to form. 18 Q -- through the membership programs? 19 A No. 20 MS. HOOVER: If you could just let me 21 finish my question. 22 Q Do you recall the fund or anyone else telling 23 Medco that they believed Medco was breaching its 24 contract by not reporting or not requiring 25 pharmacies to report membership program prices</p> <p style="text-align: right;">Page 61</p>

<p>1 Wouldn't you agree that Walgreens is just 2 one example of this type of program? 3 MR. TASIC: Objection to form. 4 A Based upon that sentence, yes. 5 Q And do you have any reason to believe that the 6 same language wouldn't apply to some other 7 pharmacy's membership program? 8 MR. TASIC: Objection to form. 9 A I have no idea. 10 Q Do you have any reason to believe that this 11 didn't apply to CVS's HSP program? 12 MR. TASIC: Objection to form. 13 A I have no idea. 14 MS. HOOVER: Nothing further. 15 MR. TASIC: We don't have anything else 16 either. 17 THE VIDEOGRAPHER: This then concludes the 18 deposition of Irene Newman on December 17th, 19 2018. The time is 11:38 a.m. and we are off the 20 record. 21 THE REPORTER: Do you want this 22 transcribed? 23 MS. HOOVER: Yes. 24 THE REPORTER: What kind of copy? 25 MS. HOOVER: Just electronic.</p> <p>Page 98</p>	<p>1 STATE OF INDIANA)) SS: 2 COUNTY OF HAMILTON) 3 4 I, Diane Zeyen, RPR, a Notary Public in and for 5 the County of Hamilton, State of Indiana, at large, 6 do hereby certify that R. IRENE NEWMAN, the deponent 7 herein, was by me first duly sworn to tell the 8 truth, the whole truth, and nothing but the truth in 9 the aforementioned matter; 10 That the foregoing deposition was taken on 11 behalf of the Defendants CVS Pharmacy, Inc., and 12 Caremark, LLC, at the offices of Taft Stettinius & 13 Hollister, LLP, One Indiana Square, Suite 3500, 14 Indianapolis, Marion County, Indiana, on the 17th 15 day of December, 2018, at 9:00 a.m., pursuant to the 16 Federal Rules of Civil Procedure; 17 That said deposition was taken down in 18 stenograph notes and afterwards reduced to 19 typewriting under my direction, and that the 20 typewritten transcript is a true record of the 21 testimony given by the said deponent; and that the 22 signature by said deponent to her deposition was not 23 waived; 24 That the parties were represented by their 25 counsel as aforementioned.</p> <p>Page 100</p>
<p>1 MS. REPORTER: Do you need a copy of the 2 transcript? 3 MR. TASIC: Yes. 4 THE REPORTER: Is Etran okay? 5 MR. TASIC: Mini. Reserve signature. 6 7 8 AND FURTHER DEPONENT SAITH NOT. 9 10 11 12 _____ 13 R. IRENE NEWMAN 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>Page 99</p>	<p>1 I do further certify that I am a disinterested 2 person in this cause of action, that I am not a 3 relative or attorney of either party or otherwise 4 interested in the event of this action, and that I 5 am not in the employ of the attorneys for any party. 6 IN WITNESS WHEREOF, I have hereunto set my hand 7 and affixed my notarial seal on this 7th day of 8 January, 2019. 9 10  11 NOTARY PUBLIC 12 13 My Commission Expires: 14 September 2, 2024 15 County of Residence: 16 Hamilton County 17 18 19 20 21 22 23 24 25</p> <p>Page 101</p>